

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LAWRENCE E. GILDER,

1:15-cv-04094-KAM-RER

Plaintiff,

-against-

**NOTICE OF MOTION  
FOR DEFAULT  
JUDGMENT**

JOHN P. GULINO, both individually and in his capacity as the Chairman of the DEMOCRATIC COMMITTEE OF RICHMOND COUNTY, DEMOCRATIC COMMITTEE OF RICHMOND COUNTY, BOARD OF ELECTIONS IN THE CITY OF NEW YORK, CLERK 1, CLERK 2 and CLERK 3, said names being as of yet unidentified parties, JOHN and JANE DOES 1-10, said names being fictitious; XYZ ENTITIES 1-10, said names being fictitious,

Defendants.

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**SIRS:**

PLEASE TAKE NOTICE that upon the annexed affirmation of Richard A. Luthmann, Esq., duly affirmed on August 6, 2015, and upon all the proceedings in this case to date, the plaintiff, will move in this court at 9:30a.m. on Friday, October 2, 2015, or at a reasonable time thereafter at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East in the Borough of Brooklyn, County of Kings, City and State of New York, or as soon thereafter as counsel can be heard, for an Order pursuant to Federal Rules of Civil Procedure granting default judgment and inquest as against defendant BOARD OF ELECTIONS IN THE CITY OF NEW YORK and for such other and further relief as may be just, proper, and equitable.

Dated: Staten Island, New York

August 6, 2015

Yours, etc.

/s/ RICHARD A. LUTHMANN

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Richard A. Luthmann, Esq.  
THE LUTHMANN LAW FIRM, PLLC  
1811 Victory Boulevard  
Staten Island, NY 10314  
Tel.: (718) 447-0003  
Fax: (347) 252-0254 (not for service)

TO: Clerk of Court  
United States Court  
Eastern District of New York  
(Via CM/ECF)

BOARD OF ELECTIONS  
IN THE CITY OF NEW YORK  
32 Broadway, 7th Floor  
New York, NY 10004  
(Via Certified US Mail RRR)

Andrew L. Hoffman  
The Law Offices of Jeffrey Chabrowe, P.C.  
261 Madison Avenue, 12th Flr.  
New York, NY 10016  
Attorneys for John P. Gulino and the  
Democratic Committee of Richmond County  
(Via CM/ECF)